

## **PSJ2 Exh 111**

IN THE UNITED STATES COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL NO. 2804  
OPIATE LITIGATION

Case No. 17-mdl-2804

Judge Dan Aaron Polster

This document relates to:

City of Cleveland, Ohio v. Purdue Pharma L.P.,  
et al.,  
Case No. 1:18-OP-45132

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Videotaped deposition of  
GREGORY L. HALL, M.D.

December 19, 2018

9:10 a.m.

Taken at:

Tucker Ellis  
950 Main Avenue  
Cleveland, Ohio

Wendy L. Klauss, RPR

1 Other than providing information to  
2 help identify patients who may be suffering  
3 from pain that is inadequately treated, have  
4 you written prescriptions based on what you  
5 perceive to be marketing regarding prescription  
6 opioids?

7 MR. CIACCIO: Objection to form.

8 A. I really write prescriptions based  
9 on education, and I'm open to get education  
10 from a number of venues, some of the time it's  
11 a marketer from a specific device, can find the  
12 good, the bad side effects. So I don't  
13 discriminate against marketing, and I'm able to  
14 analyze their information and their pros and  
15 cons and the patient outcomes as well.

16 Q. What are some of the other sources  
17 of information for you about pros and cons of  
18 prescription medications?

19 A. It's been so long. I mean, the  
20 pharmacists.

21 Q. Do you read the prescribing  
22 information that comes with prescription  
23 medication?

24 A. In the form that we get on the app  
25 on the phone, Hippocrates, we will see side

1 effects and contraindications and things of  
2 that nature.

3 Q. Hippocrates is an online source of  
4 the FDA-approved prescribing information?

5 A. Yes.

6 Q. Does Hippocrates include what are  
7 called black box warnings?

8 A. Yes.

9 Q. Have you ever reviewed the black  
10 box warnings on prescription opioids?

11 A. Yes.

12 Q. Is addiction one of the things  
13 that's warned about in the black box?

14 A. Absolutely.

15 Q. For how long have you known about  
16 the addictive properties of prescription  
17 opioids?

18 A. Well, I mean, I think that as time  
19 has passed, the sense of the addictive quality  
20 of it has significantly ramped up. So  
21 OxyContin, for example, was marketed initially  
22 as really not a danger for addiction, and then  
23 that was amended. So it's a matter of when  
24 that was.

25 Q. When did you first learn of the